

Federal Defenders
OF NEW YORK, INC

MEMO ENDORSED

Southern District
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February 11, 2021

The Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: United States v. Jimenez, et al, 19 Cr 856 (KMK)

Dear Honorable Karas:

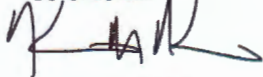
I represent Martin Dejesus Reyes-Maria in the above referenced case. I am writing to ask that you temporarily modify the terms of Mr. Reyes-Maria's release to allow him to travel to a church in New Jersey to attend his mother's wedding.¹ The ceremony is scheduled for Sunday, February 14th at 2:00pm at the Word of Wisdom Church in Teaneck, New Jersey. If approved, Mr. Reyes-Maria would leave his home in the Bronx at 1:00pm and he would return by 5:00pm.

I have communicated with pretrial officer Ashley Cosme and she indicated that "We do not consent to social events for individuals on home confinement". Similarly, AUSA James Ligtenberg does not consent to this request. Despite these objections, I ask that Your Honor grant Mr. Reyes-Maria permission to attend this small ceremony. Mr. Reyes-Maria has been compliant with the terms of his release since April 7, 2020² and Your Honor previously granted him permission to attend the hospital when his daughter needed surgery and that occurred without incident. See Docket Entry # 41. Under these circumstances, I believe that Mr. Reyes-Maria's request to go to a daytime wedding at a church is reasonable and should be granted.

Thank you very much for your consideration.

Application is denied. Mr. Reyes-Maria was subject to home confinement for a reason and that reason is not trumped by wanting to go to social occasions such as weddings.

So Ordered.



2/11/21

Sincerely,



Benjamin Gold

cc: AUSA James Ligtenberg (via e-mail and ECF)
Intensive Supervision Officer Ashley L. Cosme (via e-mail)

¹ A copy of the marriage license authorizing this wedding is attached to this letter. Since this is a small ceremony at a church, there is no formal wedding invitation.

² Probation Officer Cosme indicated that Mr. Reyes-Maria has been compliant and the pre-sentence report indicates that he "has been compliant." PSR ¶ 10